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May 21, 2023

By ECF and Email

The Honorable Lewis A. Kaplan
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Daniel Kleeberg et al. v. Lester Eber et al.*, 1:16-cv-09517-LAK-KHP
Second Joint Request to Extend All Deadlines

Dear Judge Kaplan,

I write on behalf of all parties to respectfully request that the Court again extend all of the parties' deadlines by three weeks, to June 12, 2023. The parties are still actively working on a settlement, but it is more complicated than initially thought for reasons that we can explain by conference call if the Court requires additional information.

As of this writing, Defendants' opposition to Plaintiffs' Rule 60 Motion and Plaintiffs' bill of costs and Motion for Attorney Fees are due on Monday, May 22. The Parties expect to have a resolution by early June and therefore are confident that this is a final extension.

We thank the Court for its attention to this matter.

Respectfully submitted,



Brian C. Brook

cc: All counsel of record